

Performance Based Permits

EMS Permit Pilot Project

Air Permit Streamlining Advisory Group

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EMS Permit Pilot Project

- USEPA State Innovation Grant awarded to WI in July 2005 to develop innovative permitting strategies for printers.
- DNR is working with 4 large printers to develop a permit that is:
 - Flexible
 - Multi media
 - Drives innovation
 - Meshes EMS concepts with permitting concepts

Permit Goals

- Traditional Permits
 - Compliance with all applicable regulations
 - Attaining and maintaining of air quality
- EMS Permits
 - Reduce environmental impacts
 - Drive technological innovation
 - Reward superior environmental performance

EMS Permits use Green Tier

- Pilot Facilities must enroll in Green Tier
- Develop an EMS that is ISO certified or equivalent
- Facilities are superior environmental performers and receive incentives for superior performance
- The EMS permit is one of those incentives

EMS Permit Concepts

- Performance-based Permit includes:
 - A set of clearly defined performance goals
 - Outcome focused measures
 - Ability to earn incentives by meeting performance goals

EMS Permit Concepts

- Performance-based permit includes:
 - Minimum performance requirements such as caps on emissions and assurances that air quality standards will be protected
 - Requirements to cover all permitting needs of the facility - air, water, waste, etc.

Permit Links to EMS

- How does a performance based permit link to EMS?
 - EMS is an eligibility requirement
 - EMS helps define goals to include in the permit
 - EMS designs programs to meet the goals
 - EMS requires audits and reports on progress toward and maintenance of goals

EMS Permit Concepts

- Still to do
 - Fill in details - how to set cap, how to define incentives, what compliance assurance is needed
 - EPA approval
 - Develop an enhanced public involvement strategy